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7 *[Submitting Counsel on Signature Page]*

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10
11 IN RE: JUUL LABS, INC., MARKETING,
12 SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION

13 _____
14 This Document Relates to:

15 ALL ACTIONS
16 _____

Case No. 19-md-02913-WHO

**JOINT STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
SUBMITTING DECLARATIONS
PURSUANT TO L.R. 79-5(e)(1)**

1 The parties jointly stipulate and agree, subject to the Court's approval, to a modest
 2 extension of the deadline for filing Declarations Pursuant to Local Rule 79-5(e)(1) in support of
 3 sealing portions of Plaintiffs' Opposition to Defendant Juul Labs, Inc.'s Motion to Stay Based on
 4 the FDA's Primary Jurisdiction; and Exhibits C, D, E and F to the Declaration of Sarah London in
 5 support of that opposition filed June 29, 2020.

6 WHEREAS, on June 29, 2020, Plaintiffs filed a Response in Opposition to Defendant Juul
 7 Labs, Inc.'s Motion to Stay Based on the FDA's Primary Jurisdiction (Dkt. 755);

8 WHEREAS, the Response in Opposition to Defendant Juul Labs, Inc.'s Motion to Stay
 9 Based on the FDA's Primary Jurisdiction includes several paragraphs referencing materials that
 10 are marked Confidential or Highly Confidential (*id.*);

11 WHEREAS, on June 29, 2020, Plaintiffs also filed Exhibits C, D, E and F to the
 12 Declaration of Sarah London under seal, and that contains four exhibits totaling 188 pages that
 13 are marked Confidential or Highly Confidential (Dkt. 755-1);

14 WHEREAS, Defendants received the sealed materials over the Fourth of July holiday
 15 weekend and are in the process of reviewing the cited Confidential or Highly Confidential
 16 material and ensuring compliance with the relevant sealing procedure;

17 WHEREAS, the current deadline for filing Declarations Pursuant to Local Rule 79-5(e)(1)
 18 is July 6, 2020;

19 WHEREAS, the parties met and conferred and have agreed, subject to the Court's
 20 approval, that the deadline for filing Declarations Pursuant to Local Rule 79-5(e)(1) in support of
 21 sealing portions of Plaintiffs' Opposition to Defendant Juul Labs, Inc.'s Motion to Stay Based on
 22 the FDA's Primary Jurisdiction ; and Exhibits C. D., E. and F to the Declaration of Sarah London
 23 in support of that opposition should be extended to July 20, 2020 to provide additional time for
 24 Defendants to ensure compliance with the relevant sealing procedures;

25 **NOW THEREFORE**, the parties, through their undersigned counsel, hereby stipulate,
 26 agree and respectfully request that the Court enter an Order establishing July 20, 2020 as the
 27 deadline for filing Declarations Pursuant to Local Rule 79-5(e)(1) in support of sealing portions
 28 of Plaintiffs' Opposition to Defendant Juul Labs, Inc.'s Motion to Stay Based on the FDA's

Primary Jurisdiction; and Exhibits C, D, E and F to the Declaration of Sarah London in support of that opposition.

Dated: July 6, 2020

Respectfully submitted,

By: /s/ Renee D. Smith

By: /s/ Sarah R. London

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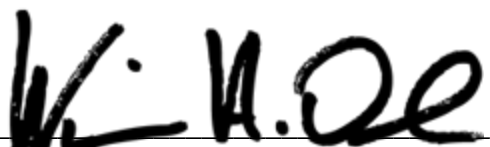
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8 *Attorneys for Defendants Altria Group, Inc.*
9 *and Philip Morris USA Inc.*

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13 **PURSUANT TO STIPULATION AND GOOD CAUSE SHOWING, IT IS SO ORDERED:**

14 The deadline for filing Declarations Pursuant to Local Rule 79-5 in connection with the
15 Plaintiffs' Opposition to Defendant Juul Labs, Inc.'s Motion to Stay Based on the FDA's Primary
16 Jurisdiction; and Exhibits C, D, E and F to the Declaration of Sarah London in support of that
17 opposition shall be extended to **July 20, 2020**.

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20 Date: July 7, 2020

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23 HONORABLE WILLIAM H. ORRICK
24 United States District Judge
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